

received by the applicant from any source.

- (b) For each person identified in response to Question 8, Section III, who has already furnished funds, purchased stock, extended credit, or guaranteed loans:

A copy of the agreement obligating the party to furnish funds, showing the amount furnished, the rate of interest, the terms of repayment, and security, if any.

- (c) For each person identified in response to Question 8, Section III, who has agreed to furnish funds, purchase stock, extend credit, or guarantee loans, a balance sheet or a financial statement showing:

All liabilities and current and liquid assets sufficient to meet current liabilities

Financial ability to comply with the terms of the agreement to furnish funds, purchase stock, extend credit, or guarantee loans; and

Net income after Federal income tax, received for the past two years.

Note: If the statement does not indicate current and liquid assets sufficient to meet the proposed commitments, the financial statement must be supplemented by a statement showing how non-liquid assets will be used to provide the funds, and the extent to which such assets have liens or prior obligations against them.

- (d) For financial institutions or equipment manufacturers, identified in response to Question 8, Section III, who have agreed to make a loan or extend credit:

The document by which the institution or manufacturer has agreed to provide the loan or credit, showing the amount of loan or credit, terms of payment or repayment of the loan, collateral or security required, rate of interest to be charged, and special requirements (e.g. moratorium on principal or interest, waiver of collateral, etc.); and

A statement from any parties required to provide special endorsements showing their willingness to provide such endorsements.

E. It is Commission policy not to approve extensions of time for construction on the basis of financial inability or unwillingness to construct.

INSTRUCTIONS FOR SECTION IV-A - PROGRAM SERVICE STATEMENT

Applicants need only file a program service statement called for in Section IV-A of this application. See Deregulation of Radio, 84 FCC 2d 968 (1981), reconsideration denied, 87 FCC 2d 797; and Commercial TV Stations, 98 FCC 2d 1076 (1984), reconsideration denied, 80 RR 2d 526 (1986).

INSTRUCTIONS FOR SECTION IV-B - INTEGRATION STATEMENT

The applicant's integration statement must identify each principal who will participate in the management of the station, his or her position, duties and hours, and for each principal whether a qualitative credit will be claimed for minority status, past local residence, female status, broadcast experience or civic activity. Any claim for "daytimer" preference must also be stated. An applicant may include its integration statement in this application, but it must file its integration statement with the Commission by the amendment as-of-right date in FM proceedings, or the "B" cut-off date in AM and television proceedings. If an applicant fails to disclose its integration statement by the amendment as-of-right or "B" cut-off date, whichever is applicable, it will receive no credit for integration in the comparative hearing.

INSTRUCTIONS FOR SECTION V - ENGINEERING DATA AND ANTENNA AND SITE INFORMATION

- A. An indication as to the specific transmitter make and model is not required on the application. Rather, any subsequent permit authorizing construction will require installation of a type accepted transmitter or one complying with the provisions of 47 C.F.R. Section 73.1660. Applicants for AM facilities are reminded of the maximum rated power limitations for transmitters imposed by 47 C.F.R. Section 73.1665.
- B. Prior to January 4, 1982, parties submitting AM directional antenna patterns pursuant to 47 C.F.R. Sections 73.150 and 73.152 (standard patterns and modified standard patterns) had to submit patterns which were tabulated and plotted using units of millivolts per meter at one mile. Beginning on January 4, 1982, such patterns must be tabulated and

EXHIBIT F

**Supplemental Discovery Requests
With Respect to Second Motion
To Enlarge Issues Against Gary E. Willson**

I. Definitions

A. "Applicant" means Willson, as defined below, and his proposal (including his application, BPH-911115MO) to construct a new FM broadcast station on Channel 265 at Calistoga, California.

B. "Discussion documents" means notes, minutes or telephone toll records, and all other documents relating or referring to, or evidencing or reflecting, meetings, telephone conversations, or other oral communications relating or referring to, or evidencing or reflecting, the subject matter identified.

C. "Document" means each tangible thing, recording or reproduction, in any manner, any visual or auditory data in the Producing Parties' possession, control or custody, including without limitation correspondence, memoranda, transcripts, photographs, stenographic or handwritten notes, studies, evaluations, analyses, reports, reviews, working papers, books, charts, telegrams, pamphlets, pictures, video or audio tapes, voice recordings, computer tapes, printout or cards, microfilm or microfiches, and any papers on which words have been written, printed, typed or otherwise affixed, and shall mean a copy where the original is not in the possession, control or custody of a Producing Party and shall mean every copy of every document where such copy is not an identical copy of an original.

D. "Identify" or "identify" when used with reference to a document shall require a statement of its name or title, its date, the identity of the person(s) who authored or signed it, the identify of the person(s) to whom it was addressed or sent, its present location, the identity of its present custodian, and a brief description of its contents.

E. "Incorporation or acquisition documents" or "corporate documents" means articles of incorporation, certificates of incorporation, bylaws, partnership agreements, certificates of partnership, minutes, merger or purchase agreements, closing papers, stock certificates, stock subscriptions or agreements, and all other documents relating or referring to, or evidencing or reflecting, the formation of Willson.

F. "Organization documents" means tables of organization, organization charts, resumes, and all other documents relating or referring to, or evidencing or reflecting, the positions, responsibilities, or qualifications of the officers, directors, partners, employees, agents, and representatives of Willson.

G. "Personal documents" means expense records and reports including any supporting documents, telephone logs, memos, and all other documents relating or referring to, or evidencing or reflecting, the travel meetings, or telephone conversations of the individuals identified.

H. "Persons" means any corporation(s) association(s), natural person(s) or other legal entities.

I. "Principal" means all officers, directors, shareholders, stock subscribers, owners, partners (limited or general), joint venturers, agents, or representatives thereof (present or former), including legal counsel and engineering consultants.

J. "Producing Party(ies)" means Willson, as defined below.

K. "Willson" means Gary E. Willson, his employees, agents, or representatives thereof, including legal counsel, engineering and other consultants.

II. Document Requests

1. All documents which reveal or relate to Gary E. Willson's current liabilities, and/or assets relied upon for the prosecution of the applicant's application, or for the construction and/or operation of the applicant's proposed station.

2. All documents which reveal or relate to Gary E. Willson's liabilities and/or assets as of November 12, 1991.

3. All documents which reveal or relate to Gary E. Willson's liabilities and/or assets as of November 15, 1991.

4. Any and all agreements concerning the loan or provision of any funds to Gary E. Willson for prosecution of his application (File No. BPH-911115MO) and for construction and operation of the facilities proposed therein.

5. Any and all documents relating to any liens and/or judgments against Gary E. Willson or Martha-Mary Willson in existence (or, in the case of judgments, unsatisfied) during the period November 12, 1991 through the present.

6. All documents relating to the cost of operating and constructing the proposed Calistoga, California FM station.

7. All documents relating to the cost of prosecuting Gary E. Willson's application.

8. All documents that reflect or relate to Gary E. Willson's long-term liabilities as of November 12, 1991 and November 15, 1991.

9. All documents that reflect or relate to the preparation of the financial statement produced in this proceeding by Gary E. Willson on June 11, 1993.

III. Other Discovery

If the requested issues are added, Moonbeam also contemplates deposing Gary E. Willson.

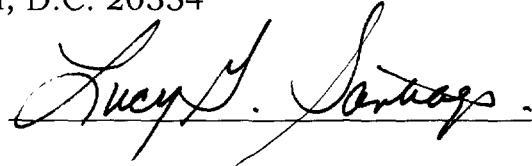
CERTIFICATE OF SERVICE

The undersigned, an employee of Haley, Bader & Potts, hereby certifies that the foregoing Second Motion to Enlarge Issues Against Gary E. Willson was hand-delivered to the following:

A. Wray Fitch, III, Esquire
Gammon & Grange
8280 Greensboro Drive
McLean, VA 22102-3807

Administrative Law Judge Edward Luton
2000 L Street N.W.
Washington, D.C. 20036

Robert Zauner, Esquire
Federal Communications Commission
Mass Media Bureau, Hearing Branch
Suite 7212
2025 M Street N.W.
Washington, D.C. 20554

A handwritten signature in cursive script, reading "Lucy J. Santiago", written over a horizontal line.

August 5, 1993